



November 3, 2022

**By ECF**

Hon. Lewis J. Liman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Convergen Energy LLC, et al. v. Brooks, et al.*  
*Case No. 1:20-CV-03746-LJL*

Dear Judge Liman:

We are writing in response to the Court's April 4, 2022 Order requesting periodic updates on the Arbitration pending as Case No. 01-20-0014-8891 before the American Arbitration Association. Since our last update on April 26, 2022, the parties have completed the pleading stage and are in discovery. The Panel has advised that it will set a Final Hearing date once the parties get closer to the end of the discovery phase.

Counsel for the Plaintiffs has approved this joint letter.

Very truly yours,

KOHNER, MANN & KAILAS, S.C.

A handwritten signature in black ink that reads "Ryan M. Billings". The signature is fluid and cursive, with "Ryan" and "Billings" being more distinct and "M." being smaller.

Ryan M. Billings/RMB

cc: Counsel of Record via ECF